


Approved: 
MATTHEW J. KING
Assistant United States Attorney

Before: THE HONORABLE ROBERT W. LEHRBURGER
United States Magistrate Judge
Southern District of New York

22 MAG 4575

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: SEALED COMPLAINT
UNITED STATES OF AMERICA :
: Violations of
- v. - : 18 U.S.C.
: §§ 371 and 922(a)(1)(A)
RONALD ROGERS, and :
ANAUNCIA ROGERS, :
: COUNTY OF OFFENSE:
Defendants. : NEW YORK
:
- - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss.:

DEAN CONIGLIARO, being duly sworn, deposes and says that he is a Special Agent with the United States Bureau of Alcohol, Tobacco, Firearms and Explosives, and charges as follows:

COUNT ONE
(Firearms Trafficking Conspiracy)

1. From at least on or about September 14, 2018, up to and including at least on or about March 25, 2022, in the Southern District of New York and elsewhere, RONALD ROGERS and ANAUNCIA ROGERS, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, trafficking in firearms in violation of Title 18, United States Code, Section 922(a)(1)(A).

2. It was part and object of the conspiracy that RONALD ROGERS and ANAUNCIA ROGERS, the defendants, and others known and unknown, not being licensed importers, licensed manufacturers, or licensed dealers of firearms within the meaning of Chapter 44, Title 18, United State Code, would and did willfully and knowingly engage in the business of dealing in firearms, and in the course of such business would and did ship, transport, and receive firearms in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922 (a)(1)(A).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following over acts, among others, were committed in the Southern District of New York and elsewhere:

a. Between on or about May 3, 2019, and on or about May 11, 2019, RONALD ROGERS, the defendant, exchanged text messages with another individual who used a phone number with a New York City area code concerning the availability and pricing of firearms being offered for sale by RONALD ROGERS.

b. On or about January 25, 2020, ANAUNCIA ROGERS, the defendant, purchased a Jimenez Arms, J.A. 380, .380 caliber, pistol (the "Jimenez Arms") and another firearm from a federal firearms dealer in Jonesboro, Georgia.

c. Between on or about January 25, 2020, and on or about January 27, 2020, RONALD ROGERS and ANAUNCIA ROGERS, the defendants, traveled from Georgia to Manhattan, and sold the Jimenez Arms to another individual.

(Title 18, United States Code, Section 371.)

COUNT TWO

(Firearms Trafficking)

4. From at least on or about September 14, 2018 up to and including at least on or about March 25, 2022, in the

Southern District of New York and elsewhere, RONALD ROGERS and ANAUNCIA ROGERS, the defendants, not being licensed importers, licensed manufacturers, or licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully and knowingly engaged in the business of dealing in firearms, and in the course of such business shipped, transported, and received firearms in interstate and foreign commerce, and traveled interstate, in violation of Title 18, United States Code, Section 922(a)(1)(A), to wit, the defendants worked together to purchase and otherwise obtain firearms in Georgia for resale in, among other places, New York City.

(Title 18, United States Code, 922(a)(1)(A), 924(a)(1), and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

5. I am a Special Agent with the United States Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"). I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement agents, witnesses, and others, as well as my examination of reports, records, audio recordings, and video footage. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

6. As set forth in detail below, the ATF has been investigating RONALD ROGERS and ANAUNCIA ROGERS, the defendants, both residents of the state of Georgia, for conspiring to traffic at least 68 firearms from Georgia to elsewhere including, primarily, New York City.

7. Specifically, between at least on or about November 1, 2019, and at least on or about March 25, 2022, ANAUNCIA ROGERS, the defendant, purchased at least 47 firearms in Georgia – six of which have been recovered during arrests in the Southern District of New York. She coordinated her firearms purchases with RONALD ROGERS, the defendant, who then transported firearms purchased by her to New York City and elsewhere for sale to others.

8. Prior to that time, and since at least as early as in or about September 14, 2018, RONALD ROGERS has been conspiring with others to traffic firearms purchased in Georgia.

9. And, based on my review of law enforcement records, I know that RONALD ROGERS and ANAUNCIA ROGERS are not licensed importers, manufacturers, or dealers of firearms.

The Trafficking Conspiracy Between 2018 and 2019

10. Based on my review of records from an iCloud account belonging to RONALD ROGERS, the defendant, I know that RONALD ROGERS has been engaged in a conspiracy to traffic firearms between Georgia, New York City, and elsewhere since at least in or about September 14, 2018. For example:

a. RONALD ROGERS posted on social media a video of law enforcement pulling him over on the road on or about September 14, 2018. He placed a caption on that video stating, “[u] do t kno a hard time until u face one pulled over almost got caught up trafficking 8 guns.”

b. Then, between at least on or about February 18, 2019, and on or about November 17, 2019, RONALD ROGERS communicated via text message with several different individuals, including at least one individual using a phone number with a New York City area code, to discuss obtaining and selling firearms and to take orders for firearms. For example:

i. On or about February 18, 2019, RONALD ROGERS exchanged text messages with another individual (“Indiviudal-1”), explaining, in sum and substance, that a

customer had tried to buy two firearms from RONALD ROGERS and had asked RONALD ROGERS for a discount, which he did not provide.

ii. On or about February 20, 2019, another individual ("Indiviudal-2") sent a text message to RONALD ROGERS stating, in sum and substance, that a relative wanted to buy a gun from RONALD ROGERS for \$200. In response, RONALD ROGERS sent a text message to Indiviudal-2 stating, "I can do a 380 for that price." Based on my training and experience, I know that "a 380" is a reference to a .380 caliber firearm.

iii. On or about April 1, 2019, RONALD ROGERS sent a text message to another individual ("Individual-3") stating, in sum and substance, that he had picked up a firearm for Individual-3's brother. In response, Individual-3 sent a text message to RONALD ROGERS, which stated, in sum and substance, that he was going to try to give RONALD ROGERS \$150 for a 9mm firearm.

iv. On or about April 7, 2019, RONALD ROGERS sent a text message to another individual ("Indiviudal-4"), stating, in sum and substance, that Individual-4's brother was trying to buy a "Smith" from RONALD ROGERS, but that RONALD ROGERS would find another firearm for Individual-4's brother "b4 I come." Based on my training and experience, I know that "Smith" refers to a Smith and Wesson firearm.

v. On or about April 18, 2019, another individual ("Individual-5") sent a text message to RONALD ROGERS asking him if he "got a 9." In response, RONALD ROGERS sent a text message stating, "[p]lenty," as well as further messages explaining, in sum and substance, that the price depended on how much Indiviudal-5 wanted to spend and the firearm RONALD ROGERS wanted to sell. Based on my training and experience, I understand "a 9" to mean a 9mm firearm.

vi. On or about May 3 and May 11, 2019, an individual ("Individual-6"), using a phone number with a New York City area code, sent a text message to RONALD ROGERS asking, in sum and substance, whether certain "joints" were

available. In response, on or about May 11, RONALD ROGERS sent a text message to Individual-6, stating, in sum and substance, that three had just become available and that they were \$350 each. Based on my training and experience, I understand "joints" refers to firearms.

vii. On or about October 3, 2019, RONALD ROGERS sent a text message to Individual-4 stating that he had "2[] joints on the market."

viii. And, on or about November 17, 2019, RONALD ROGERS sent a text message to Individual-4 stating, in sum and substance, that he had found a cheaper store from which to buy firearms and that the store sold revolvers, which people want to buy.

Gun Purchases Between 2019 and 2022

11. Based on my review of law enforcement records and records from licensed federal firearms dealers ("FFLs") in Georgia, I know that starting in or about at least November 1, 2019, ANAUNCIA ROGERS, the defendant, joined this gun trafficking conspiracy. More specifically, between in or about November 1, 2019, and in or about March 25, 2022, ANAUNCIA ROGERS purchased at least 47 firearms from seven different FFLs in Georgia (the "Gun Purchases"). Those FFLs include: FFL-1, located in Jonesboro, Georgia, FFL-2, located in Stockbridge, Georgia, FFL-3, located in Forest Park, Georgia, FFL-4, located in Hampton, Georgia, FFL-5, located in Hampton, Georgia, FFL-6, located in McDonough, Georgia, and FFL-7, located in Stockbridge, Georgia.

12. Specifically, based on my review of ATF Form 4473s (Firearms Transaction Record ("Form 4473")) obtained from the FFLs described above, and Regional Crime Gun Center trace reports ("Trace Reports"), I know the following:

a. Between on or about November 1, 2019 and on or about March 23, 2022, ANAUNCIA ROGERS, the defendant, purchased at least 14 firearms from FFL-1.

b. Between on or about February 18, 2020 and on or about November 9, 2020, ANAUNCIA ROGERS purchased at least 11 firearms from FFL-2.

c. Between on or about February 21, 2020 and on or about April 11, 2021, ANAUNCIA ROGERS purchased at least 6 firearms from FFL-3.

d. Between on or about September 16, 2020 and on or about December 29, 2020, ANAUNCIA ROGERS purchased at least 5 firearms from FFL-4.

e. Between on or about October 2, 2020 and on or about June 3, 2021, ANAUNCIA ROGERS purchased at least 7 firearms from FFL-5.

f. Between on or about March 11, 2022 and on or about March 25, 2022, ANAUNCIA ROGERS purchased 3 firearms from FFL-6.

g. On or about February 3, 2021, ANAUNCIA ROGERS purchased at least 1 firearm from FFL-7.

13. In addition, based on my conversations with other law enforcement officers, including a law enforcement officer who conducted surveillance of ANAUNCIA ROGERS, the defendant, on September 28, 2021, I know the following, among other things:

a. On or about September 28, 2021, ANAUNCIA ROGERS purchased a firearm from FFL-1. After purchasing that firearm, ANAUNCIA ROGERS exited FFL-1 while talking on her cellphone. ANAUNCIA ROGERS then travelled by Uber to an apartment complex nearby, which was not her known residence. She left the Uber carrying a bag and entered a particular apartment in the complex.

b. Based on my training and experience and my participation in this investigation, I believe that ANAUNCIA ROGERS was dropping off the firearm she had purchased.

14. In addition, based on my review of surveillance video obtained from FFL-1, I know the following, among other things:

a. On or about March 23, 2022, ANAUNCIA ROGERS, the defendant, can be seen inside FFL-1 purchasing a firearm. While she is inside FFL-1 she appears to be utilizing her cellphone.

15. Based on my review of surveillance video obtained from FFL-6, I know that, on or about March 25, 2022, after she purchased a firearm from inside FFL-6, ANUANCIA ROGERS, the defendant, walked to the parking lot and entered the front passenger seat of a car that resembles one of the cars owned by RONALD ROGERS, the defendant.

The Gun Recoveries

16. Based on my involvement in the investigation, my review of Trace Reports, and my conversations with other law enforcement officers, I have learned, among other things, that six firearms purchased by ANAUNCIA ROGERS, the defendant, in Georgia during the conspiracy were recovered during the arrests of individuals in the Southern District of New York. Specifically:

a. On or about February 18, 2020, members of the New York City Police Department ("NYPD") recovered a Jiminez Arms, Model J.A. 380, .380 caliber, pistol during the arrest of an individual in Manhattan, New York (the "Jiminez Arms"). A Trace Report revealed that the Jiminez Arms was purchased by ANAUNCIA ROGERS, the defendant, at FFL-1 on or about January 25, 2020. The time to crime, which is a measure of the time between the purchase of a firearm and the recovery of that firearm in a crime, was approximately twenty-four days. The Trace Report also revealed that at the time of the Jiminez Arms purchase, ANAUNCIA ROGERS also purchased from Arrowhead Pawn Shop a Taurus, Model PT738 TCP, .380 caliber, pistol (the "Taurus"). The Taurus was also recovered during the arrest of a different individual in Manhattan, New York. See, *infra*, ¶16b.

b. On or about October 16, 2020, members of the NYPD recovered the Taurus described above during the arrest of an individual in Manhattan, New York. A Trace Report revealed that the Taurus was purchased by ANAUNCIA ROGERS in Georgia on or about January 25, 2020. The time to crime was approximately 265 days.

c. On or about January 22, 2021, members of the NYPD recovered a Phoenix Arms, Model HP22A, .22 caliber pistol during the arrest of an individual in Manhattan, New York (the "Phoenix Arms"). A Trace Report revealed that the Phoenix Arms was purchased by ANAUNCIA ROGERS at FFL-1 on or about January 16, 2021. The time to crime was approximately seven days. The Trace Report also revealed that at the time of the Phoenix Arms purchase, ANAUNCIA ROGERS also purchased from FFL-1 two other firearms: (1) a Cobra Ent./Kodiak Ind./Bearman Ind., Model FS380, .380 caliber, pistol and (2) a Phoenix Arms, Model HP25A, .25 caliber, pistol.

d. Also on or about January 22, 2021, members of the NYPD recovered a North American Arms, Model NAA22, .22 caliber, revolver during the arrest of an individual in Manhattan, New York (the "North American Arms"). A Trace Report revealed that the North American Arms was purchased by ANAUNCIA ROGERS at FFL-5 on or about January 16, 2021. The time to crime was approximately seven days. The Trace Report also revealed that at the time of the North American Arms purchase, ANAUNCIA ROGERS also purchased from FFL-5 two other firearms: (1) a Taurus, G2C, 9mm, pistol and (2) a Ruger, LCP II, .380 caliber, pistol (the "Ruger LCP II"). The Ruger LCP II was also recovered during the arrest of an individual in Manhattan, New York. See, *infra*, ¶16e.

e. On September 21, 2021, members of the NYPD recovered the Ruger LCP II, described above, during the arrest of an individual in Manhattan, New York. A Trace Report revealed that the Ruger LCP II was purchased by ANAUNCIA ROGERS at FFL-5 on or about January 16, 2021. The time to crime was approximately 248 days.

f. And, on April 8, 2022, members of the NYPD recovered a Bearman Industries BBG380 Derringer, .380 caliber pistol (the "Derringer"), during an arrest of an individual in Manhattan, New York. A Trace Report revealed that the Derringer was purchased by ANAUNCIA ROGERS at FFL-7 on or about February 3, 2021. The time to crime was approximately 429 days.

17. Based on my training and experience, I know that a "straw purchase" is a transaction during which a firearms purchaser acquires firearms for someone who is prohibited by law from possessing one or for someone who does not want his name associated with the transaction.

18. Based on the above information, including the number of firearms purchased by ANAUNCIA ROGERS, the defendant, and the short time to crime for many of the six firearms purchased by ANAUNCIA ROGERS in Georgia that were recovered in New York City, as well as my training and experience, I believe that ANAUNCIA ROGERS was making "straw purchases" of firearms on behalf of others.

RONALD ROGERS Trafficked to New York City Firearms Purchased by ANAUNCIA ROGERS in Georgia

19. Based on my review of historical cellsite location information, the records associated with gun purchases made by ANUANICA ROGERS, the defendant, in Georgia, see ¶¶ 11-12 *supra*, and records from iCloud accounts belonging to ANAUNCIA ROGERS and RONALD ROGERS, the defendant, among other things, I believe that between at least in or about January 2020 and at least in or about June 2021, RONALD ROGERS repeatedly travelled to New York City, usually by car, to sell or deliver to others the firearms purchased by ANAUNCIA ROGERS in Georgia.

The January 2020 Purchases

20. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANUANICA ROGERS, the defendant, I know the following, among other things:

a. On or about January 25, 2020, ANAUNCIA ROGERS purchased two firearms in Georgia.

b. Between on or about January 25, 2020, and on or about January 27, 2020, RONALD ROGERS, the defendant, and ANANUCIA ROGERS travelled from Georgia to New York and back.

c. As explained in more detail above, see ¶ 16 *supra*, both of the firearms purchased by ANANUCIA ROGERS on January 25, 2020, were recovered by the NYPD in New York. One was recovered approximately twenty-four days after it was purchased by ANAUNCIA ROGERS.

The February 2020 Purchases

21. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANAUNCIA ROGERS, the defendant, I know the following, among other things:

a. Between on or about February 18, 2020, and on or about February 29, 2020, ANUANCIA ROGERS purchased seven firearms in Georgia.

b. RONALD ROGERS, the defendant, travelled from Georgia to New York and back between on or about February 29, 2020, and on or about March 2, 2020.

22. Based on my review of records from an iCloud account belonging to RONALD ROGERS, the defendant, I believe that RONALD ROGERS trafficked one or more of those firearms to New York City. For example:

a. A video created on or about February 29, 2020, depicts RONALD ROGERS holding cash next to five firearms, at least four of which resemble firearms purchased by ANAUNCIA ROGERS, the defendant, in February 2020.

b. A video created on or about March 2, 2020, depicts RONALD ROGERS in the driver seat of a car counting out

hundreds of dollars of what he described as "new money" alongside a firearm.

c. Another video created on or about March 2, 2020, is a compilation of shorter videos showing, among other things, RONALD ROGERS (i) traveling in a car to different places along the route from his home in Georgia to New York City, (ii) being in New York City with a female that resembles ANAUNCIA ROGERS, (iii) possessing firearms in the car, and (iv) counting out hundreds of dollars in the car. The video also contains text stating, among other things, "Let's get this bread!," which, based on my training and experience, I understand refers to getting money, and "I risk my freedom for my family got food in the freezer."

June and July 2020 Purchases

23. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANAUNICA ROGERS, the defendant, I know the following, among other things:

a. Between on or about June 16, 2020, and on or about July 9, 2020, ANAUNCIA ROGERS purchased three firearms in Georgia.

b. RONALD ROGERS, the defendant, travelled from Georgia to New York and back to Georgia between on or about July 13, 2020, and on or about July 15, 2020.

24. Based on my review of records from an iCloud account belonging to RONALD ROGERS, the defendant, I believe that RONALD ROGERS trafficked one or more of those firearms to New York City. For example:

a. A video created on or about July 14, 2020, depicts RONALD ROGERS driving in what appears to be New York City with hundreds of dollars of cash displayed inside his car.

b. A video created on or about July 15, 2020, depicts RONALD ROGERS driving and displaying cash and a firearm

that resembles one of the firearms purchased by ANAUNCIA ROGERS in July 2020.

c. A video created on or about July 16, 2020, depicts a female counting out hundreds of dollars in cash alongside text stating, "she love when I come home wit gifts of money m shit."

August 2020 Purchases

25. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANAUNCIA ROGERS, the defendant, I know the following, among other things:

a. Between on or about August 11, 2020, and on or about August 24, 2020, ANAUNCIA ROGERS purchased four firearms in Georgia.

b. RONALD ROGERS, the defendant, travelled from Georgia to New York and back twice between on or about August 24, 2020, and on or about September 3, 2020.

26. Based on my review of records from an iCloud account belonging to RONALD ROGERS, the defendant, I believe that RONALD ROGERS trafficked one or more of those firearms to New York City. For example:

a. A photograph created on or about August 12, 2020, and a video created on or about August 18, 2020, depict RONALD ROGERS with three firearms that resemble the three firearms that ANAUNCIA ROGERS, the defendant, purchased on or about August 11 and August 12, 2020.

b. A photograph created on or about August 24, 2020, depicts on RONALD ROGER's bed a firearm that resembles the firearm purchased by ANAUNCIA ROGERS on or about August 24, 2020.

c. A video created on or about August 27, 2020, depicts RONALD ROGERS walking in Manhattan with a large

black duffle bag, while a photograph created on or about the same day shows RONALD ROGERS with a stack of cash and the same large black duffle bag inside what appears to be an apartment building.

d. A video created on or about August 29, 2020, depicts a large stack of cash on RONALD ROGER's bed with text stating, "1 weekend of work."

September 2020 Purchases

27. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANAUNCIA ROGERS, the defendant, I know the following, among other things:

a. On or about September 10, 2020, ANAUNCIA ROGERS purchased two firearms in Georgia, and, between on or about September 10, 2020, and on or about September 14, 2020, RONALD ROGERS, the defendant, travelled from Georgia to New York and back.

b. On or about September 16, 2020, ANAUNCIA ROGERS purchased two firearms in Georgia, and, between on or about September 16, 2020, and on or about September 21, 2020, RONALD ROGERS travelled from Georgia to New York and back.

c. And on or about September 24, 2020, ANAUNCIA ROGERS purchased one firearm in Georgia, and, between on or about September 24, 2020, and on or about September 29, 2020, RONALD ROGERS travelled from Georgia to New York and back.

28. Based on my review of records from an iCloud account belonging to RONALD ROGERS, the defendant, I believe that RONALD ROGERS trafficked one or more of those firearms to New York City. For example:

a. A video created on or about September 11, 2020, depicts RONALD ROGERS holding five gun boxes, with text stating, "[b]eeefin with me is not healthy."

b. A photograph created on or about September 12, 2020, depicts RONALD ROGERS in a hotel room with stacks of cash.

c. A video created on or about September 13, 2020, depicts RONALD ROGERS driving a car in Manhattan, specifically, Harlem, with text stating, "[e]arly bird get the worm 1st."

d. Two photographs created on or about September 17, 2020, depict RONALD ROGERS with a firearm bearing a serial number that matches one of the firearms purchased by ANAUNCIA ROGERS, the defendant, on or about September 16, 2020.

e. Another photograph created on or about September 17, 2020, depicts RONALD ROGERS with another firearm that resembles the other firearm purchased by ANAUNCIA ROGERS on or about September 16, 2020.

f. A photograph created on or about September 19, 2020, depicts RONALD ROGERS in a hotel room holding a stack of cash, while a video created on or about the same day depicts RONALD ROGERS driving a car in Manhattan.

g. A photograph created on or about September 24, 2020, depicts RONALD ROGERS with a firearm bearing a serial number that matches the serial number of a firearm purchased by ANAUNCIA ROGERS on or about that same day.

h. A video created on or about September 27, 2020, depicts RONALD ROGERS driving in New York City with hundreds of dollars in cash along with text stating, "[b]arely get sleep I'm trynna make sure everybody eat." Based on my training and experience, I understand that phrase to refer to making money.

October 2020 Purchase

29. Based on my review of the historical cellsite location information, records associated with gun purchases made by ANAUNCIA ROGERS, the defendant, and records from an iCloud

account belonging to RONALD ROGERS, the defendant, I know the following, among other things:

a. On or about October 2, 2020, ANAUNCIA ROGERS purchased one firearm in Georgia.

b. RONALD ROGERS travelled from Georgia to New York and back to Georgia between on or about October 2, 2020, and on or about October 10, 2020.

c. A video created on or about October 8, 2020, depicts RONALD ROGERS in Manhattan.

November 2020 Purchases

30. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANAUNCIA ROGERS, the defendant, I know the following, among other things:

a. Between on or about November 9, 2020, and on or about November 18, 2020, ANAUNCIA ROGERS purchased two firearms in Georgia.

b. RONALD ROGERS, the defendant, travelled from Georgia to New York and back between on or about November 18, 2020, and on or about November 30, 2020.

31. Based on my review of records from an iCloud account belonging to RONALD ROGERS, the defendant, I believe that RONALD ROGERS trafficked one or more of those firearms to New York City. For example:

a. A photograph created on or about November 9, 2020, depicts a firearm with the same serial number as the firearm that ANAUNCIA ROGERS, the defendant, purchased on or about that same day.

b. A video created on or about November 21, 2020, depicts RONALD ROGERS with a firearm that resembles the

firearm ANAUNCIA ROGERS purchased on or about November 9, 2020, along with at least one other firearm.

c. A video created on or about November 24, 2020, depicts RONALD ROGERS in a location with a geo-tag marked as "139 and Lenox," which I understand to be a location in Manhattan.

d. A photograph created on or about November 28, 2020, depicts a different firearm than the ones purchased by ANAUNCIA ROGERS in or about November 2020, a band of cash, and a blue bandana, which is a bandana that I recognize as belonging to RONALD ROGERS.

December 2020 Purchases

32. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANAUNCIA ROGERS, the defendant, I know the following, among other things:

a. Between on or about December 22, 2020, and on or about December 29, 2020, ANAUNCIA ROGERS purchased three firearms in Georgia.

b. RONALD ROGERS, the defendant, travelled from Georgia to New York and back between on or about December 29, 2020, and on or about December 31, 2020.

33. Based on my review of records provided by Moneygram, I know that, on or about December 22, 2020, which is the same day that ANAUNCIA ROGERS, the defendant, purchased a firearm in Georgia, an individual in Brooklyn, New York ("CC-1") sent \$1,000 to RONALD ROGERS in Georgia.

34. Based on my review of records from a law enforcement database, I know that CC-1 has a prior felony conviction in New York City for a firearms charge.

35. Based on my review of records from an iCloud account belonging to RONALD ROGERS, the defendant, I know that

another individual ("CC-2") was texting with RONALD ROGERS on or about December 29 and 30, 2020. The text messages from CC-2, in sum and substance, (i) explained that he had gathered money from other people and sent it to RONALD ROGERS, (ii) asked if RONALD ROGERS was coming, (iii) demanded that RONALD ROGERS send the money back, and (iv) told RONALD ROGERS to send the money back to CC-1.

36. In addition, based on my review of records from RONALD ROGERS's iCloud, I know the following, among other things:

a. A photograph created on or about December 24, 2020, depicts a firearm that resembles the firearm purchased by ANAUNCIA ROGERS, the defendant, on or about December 23, 2020.

b. A video created on or about December 31, 2020, depicts RONALD ROGERS in a car displaying hundreds of dollars in cash.

January 2021 Purchases

37. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANAUNCIA ROGERS, the defendant, I know the following, among other things:

a. On or about January 16, 2021, ANAUNCIA ROGERS purchased six firearms in Georgia.

b. RONALD ROGERS, the defendant, travelled from Georgia to New York and back to Georgia between on or about January 21, 2021, and on or about January 25, 2021.

c. And, as explained in more detail above, see *supra* ¶16, three of the six firearms purchased by ANAUNCIA ROGERS on or about January 16, 2021, were recovered by the NYPD in New York.

38. Based on my review of records from an iCloud account belonging to RONALD ROGERS, the defendant, I believe that RONALD ROGERS trafficked one or more of those firearms to New York City. For example:

a. A video created on or about January 15, 2021, one day before ANAUNCIA ROGERS, the defendant, purchased six firearms in Georgia, depicts two firearms, over \$1,000 in cash, and a pair of gloves that I believe belong to RONALD ROGERS.

b. A video created on or about January 18, 2021, depicts eight firearms, six of which resemble the six firearms purchased by ANAUNCIA ROGERS on or about January 16, 2021. In addition, the video shows the same pair of gloves depicted in the January 15, 2021 video.

c. Two videos created on or about January 22 and January 23, 2021, depict RONALD ROGERS staying in a hotel room.

March 2021 Purchases

39. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANAUNCIA ROGERS, the defendant, I know the following, among other things:

a. On or about March 31, 2021, ANAUNCIA ROGERS purchased two firearms in Georgia.

b. RONALD ROGERS, the defendant, travelled from Georgia to New York and back twice between on or about April 1, 2021, and on or about April 10, 2021.

40. Based on my review of an Instagram account used by RONALD ROGERS, the defendant, (the "ROGERS Instagram Account")¹, I know the following, among other things:

¹ Based on my comparison of publicly available photographs from the Rogers Instagram Account with a photograph from a Georgia driver's license issued to

a. On March 31, 2021, the same day that ANAUNCIA ROGERS, the defendant, purchased the two firearms in Georgia, RONALD ROGERS posted a story to the ROGERS Instagram Account that depicted on the seat of a car two in-box firearms that resemble those purchased by ANAUNCIA ROGERS. That same Instagram story included text stating, "put \$10K in the stash...", which, based on my training and experience, I understand to mean that RONALD ROGERS had gained \$10,000 by, among other things, selling the firearms depicted.

b. Three days later, on April 3, 2021, RONALD ROGERS posted another story to the ROGERS Instagram Account that portrayed a highway sign for Interstate 95 to New York.

41. Based on my review of records from Enterprise, I know that RONALD ROGERS paid to rent a car from an Enterprise location in Georgia for the period of April 1, 2021 (one day after ANAUNCIA ROGERS purchased the Rugers), to April 12, 2021.

42. In addition, based on my review of records from an iCloud account belonging to RONALD ROGERS, the defendant, I believe that RONALD ROGERS trafficked one or more of those firearms to New York City. For example, a video created on or about April 4, 2021, which is geo-tagged in the Bronx, depicts RONALD ROGERS counting out hundreds of dollars in cash.

April 2021 Purchases

43. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANAUNCIA ROGERS, the defendant, I know the following, among other things:

a. On or about April 11, 2021, ANAUNCIA ROGERS purchased two firearms in Georgia.

RONALD ROGERS, I believe that RONALD ROGERS is the user of the ROGERS Instagram Account.

b. RONALD ROGERS, the defendant, travelled from Georgia to New York and back to Georgia between on or about April 13, 2021, and on or about April 16, 2021.

44. Based on my review of records from an iCloud account belonging to RONALD ROGERS, the defendant, I believe that RONALD ROGERS trafficked one or more of those firearms to New York City. For example, a video created on or about April 14, 2020, which is geo-tagged in Harlem, New York, depicts RONALD ROGERS displaying a band of cash with text stating, "I'm from Harlem son got no problems selling nothing."

June 2021 Purchases

45. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANAUNCIA ROGERS, the defendant, I know the following, among other things:

a. On or about June 3, 2021, ANAUNCIA ROGERS purchased one firearm in Georgia.

b. RONALD ROGERS travelled from Georgia to New York and back to Georgia between on or about June 5, 2021, and on or about June 9, 2021.

46. Based on my review of records from an iCloud account belonging to ANAUNCIA ROGERS, the defendant, I know that ANAUNCIA ROGERS purchased the firearm on June 3, 2021, for RONALD ROGERS. Specifically, text messages from June 3, 2021, that are preserved in ANAUNCIA ROGERS's iCloud show RONALD ROGERS sending money to ANAUNCIA ROGERS and ANAUNCIA ROGERS asking RONALD ROGERS specific questions about the manufacturer, model, and caliber of the firearm he wanted. Ultimately, ANUANCIA ROGERS texted RONALD ROGERS that she purchased a "smith and wesson 380," which matches the firearm that ANAUNCIA ROGERS purchased from FFL-1 on June 3, 2021.

47. In addition, based on my review of records from an iCloud account belonging to RONALD ROGERS, the defendant, I know that a video created on or about June 12, 2021, depicts

RONALD ROGERS with large amounts of cash and text stating, among other things, "[w]hen I made 100 grand I said I would quit but I made 100 grand n kept taking trips."

September 2021 Purchases

48. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANAUNCIA ROGERS, the defendant, I know the following, among other things:

a. Between on or about September 23, 2021, and on or about September 28, 2021, ANAUNCIA ROGERS purchased three firearms in Georgia.

b. RONALD ROGERS, the defendant, was present in Georgia on the dates that ANAUNCIA ROGERS purchased the three firearms discussed above, and then traveled to New York City, including Manhattan and the Bronx, on or about September 29, 2021.

March 2022 Purchases

49. Based on my review of the historical cellsite location information and the records associated with gun purchases made by ANAUNCIA ROGERS, the defendant, I know the following, among other things:

a. Between on or about March 11, 2022, and on or about March 25, 2022, ANAUNCIA ROGERS purchased four firearms in Georgia.

b. RONALD ROGERS, the defendant, was present in Georgia on the dates that ANAUNCIA ROGERS purchased the four firearms discussed above, and then traveled to New York City, including Manhattan and the Bronx, on or about March 29, 2022.

WHEREFORE, deponent respectfully requests that warrants be issued for the arrests of RONALD ROGERS and ANAUNCIA ROGERS, the defendants, and that they be arrested and imprisoned or bailed, as the case may be.

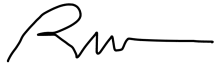
S/ by the Court with permission

DEAN CONIGLIARO

Special Agent

Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me by
Reliable electronic means
this 24th day of May, 2022



THE HONORABLE ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK